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## ACTION REQUEST RESPONSE

**To:** Utah Public Service Commission

**From:** Utah Division of Public Utilities  
Chris Parker, Director  
Energy Section  
Artie Powell, Manager  
Abdinasir M. Abdulle, Technical Consultant  
Charles Peterson, Technical Consultant

**Date:** March 6, 2013

**Re:** 13-035-01 (11-999-05) Rocky Mountain Power's Proposed Utah Service Reliability Performance Baseline

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### RECOMMENDATION (APPROVAL)

The Division of Public Utilities ("Division") recommends that the Commission approve Rocky Mountain Power's proposed Utah service reliability performance baseline file with Commission on January 7, 2013. Based on its review, the Division concluded that Rocky Mountain Power ("Company") is in compliance with Rule R746-313-4(2).

### ISSUE

Pursuant to Rule R746-313(2), the Company filed its Utah Service reliability Performance Baselines with the Commission on January 7, 2013. On the same date, the Commission issued an Action Request asking the Division to review the Company's filing and make recommendations. The Commission also asked the Division to report back by February 6, 2013. On February 6, 2012, the Division requested that the Commission extend the reporting due date to March 6, 2013. In its Order on this Docket dated February 11, 2013, the Commission granted the extension. This memorandum represents the Division's response to the Commission Action Request.

## **DISCUSSION**

On January 7, 2013, Pursuant to Rule R746-313-4(2) and R746-313(3), the Company filed its proposed reliability performance baselines and the other requirements of the Rules. The Division reviewed the Company's filing and expressed some concern in relation to the methods used to determine the baselines and notification limits for SAIDI and SAIFI. The Division relayed its concerns to the Company which decided to file with the Commission a revised version of the original filing, which considers the Division's concerns. On March 5, 2013, the Company filed with the Commission its revised filing. The Division reviewed the revised filing in light of Rules R746-313-4 (2) and R746-313-4 (3) and the reasonableness of the methods used to determine the baselines and the notification limits for SAIDI and SAIFI.

The above mentioned Rules are reproduced here for ease of reference.

### **R746-313-4 (2).**

Within 3 months after the effective date of these rules an electric company whose governing authority is the commission must file for commission approval of reliability performance baselines for SAIDI and SAIFI reliability indices.

### **R746-313-4 (3).**

The filing required by 746-313-4(2) must include, but is not limited to:

- (a) the basis for the proposed SAIDI and SAIFI values; and
- (b) identification of systems and description of internal processes to collect, monitor and analyze interruption data and events including:
  - (i) definitions of all parameters used to calculate the proposed standards and major event days, and the time-period upon which the proposed standards are based (e.g., 12-month rolling average, 365-day rolling average, annual average);
  - (ii) identification of all proposed deviations from IEEE 1366 used in the calculation of reliability indices and determination of major event days; and
  - (iii) a description of all data estimation methods used for the collection and calculation of SAIDI, SAIFI, CAIDI, and MAIFIE.

In light of these rules, the Division determined that the Company included in its filing the appropriate information required by the above mentioned Rules. Therefore, the Company is in compliance with the Commission Rules.

In determining the baselines for the SAIDI and SAIFI, using data for the most recent 6 years on a 12-month rolling average basis, the Company constructed the control limits for these measures using a 95 percent confidence interval to establish an acceptable range within which reliability falls. The midpoint of the control band was, then, identified as the baseline for these measures. The result of this exercise was that the baseline for

SAIDI and SAIFI are 176 minutes and 1.6 events, respectively. If either or both the SAIDI and SAIFI values exceed the upper limit of the control band values for three consecutive months, then the Company will have to notify the Commission. The upper limits for the control band for SAIDI and SAIFI are 201 minutes and 1.9 events, respectively. The Division deems these methods as reasonable and recommends the Commission to accept them.

## **CONCLUSION**

Based on the foregoing, the Division concludes that Company is in compliance with the Commission Rules R746-313-4 (2) and R746-313-4 (3) and that the methods used to determine the baselines and notification limits for the SAIDI and SAIFI are reasonable. Therefore, the Division recommends that the Commission approve the Company proposal as filed.

CC: Dave Taylor, RMP  
Michele Beck, OCS